

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Metal Bank of America State Road - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: POLREP #9
Final POLREP
Metal Bank of America State Road
A3DE
Philadelphia, PA
Latitude: 40.0203300 Longitude: -75.0389500

To: Ragesh Patel, DEP
Gerald Heston, EPA
Response Center RRC, EPA
Response Center RRC, EPA

From: Michael Towle, On-Scene Coordinator

Date: 5/10/2017

Reporting Period: thru 11/22/2016

1. Introduction

1.1 Background

Site Number:	A3DE	Contract Number:
D.O. Number:		Action Memo Date: 9/28/2011
Response Authority:	CERCLA	Response Type: Time-Critical
Response Lead:	EPA	Incident Category: Removal Action
NPL Status:	Non NPL	Operable Unit:
Mobilization Date:	9/28/2015	Start Date: 4/20/2015
Demob Date:	10/27/2016	Completion Date: 10/27/2016
CERCLIS ID:		RCRIS ID:
ERNS No.:		State Notification:
FPN#:		Reimbursable Account #:

Incident Category

This Site is the location of a release of hazardous substances into soil which had subsequently migrated into a combined sewer system allowing hazardous substances to migrate from the Site and into the nearby Delaware River.

Site Description

The Site includes an area of soil contaminated by polychlorinated biphenyls (PCBs) now covered by asphalt. An estimated 25,000 cubic yards of PCBs-contaminated soil is located at the Site underneath the asphalt. A combined storm and sanitary sewer system (drainage system) underlies the Site and exists within the area of contaminated soil. PCBs have been detected in the liquids and solids within the drainage system at concentrations which indicate that PCBs are migrating from the soil at the Site and then into the drainage system.

Location

The Site is located along State Road in the City of Philadelphia, Pennsylvania. The Site is located immediately northeast of the intersection of State Road and Knorr Street.

Description of Threat

PCBs released from the soil at the Site and into the combined storm and sanitary sewer that courses under the Site. The contaminated drainage either migrates to the POTW or, in high flow periods, to the Delaware River. PCBs are known to bioaccumulate in fatty tissue and pose a threat to those consuming fish removed from the Delaware River. See Action Memo dated September 28, 2011 for a more thorough description of the Site threats.

Preliminary Removal Assessment/Removal Site Inspection Results

See Prior POLREPs.

The removal site evaluation was conducted using existing information and the results of sampling and analysis conducted April 2011. The removal site evaluation indicated approximately 25,000 cubic yards of PCBs-contaminated soils were under the asphalt cover at the Site and that some of these PCBs were migrating into the drainage system coursing through the Site. This drainage had a pathway to the nearby Delaware River.

In June 2016, the OSC coordinated with the EPA's START contractor to conduct additional removal site evaluation activities. A plan was developed for the installation, development, and sampling of ground water monitoring wells at the Site. The purpose was to allow for the evaluation of the magnitude and potential for

PCBs contamination to be present in the ground water and migrate beyond the area of soil contamination. The wells were installed in June 2016 and sampled in July 2016 along with 2 wells already existing at the Site. The analytical results of the ground water sampling were received August 25, 2016. PCBs were not detected in the ground water to indicate that PCBs are able to migrate from the area under the asphalt cover to off-Site locations.

2. Current Activities

2.1 Operations Section

Narrative

Based upon the results of a removal site evaluation, the OSC proposed and EPA Region III selected a Removal Action intending to reduce the off-site migration of PCBs from the Site. An Action Memorandum was signed September 28, 2011 selecting the installation of a liner system inside the drainage in order to minimize the migration of PCBs from the soil into the combined sewer and then off-site.

The liner system was installed in October 2015 under an Administrative Settlement Agreement with PADOT. This activity accomplished the bulk of the scope of the Removal Action was accomplished by PADOT pursuant to an Administrative Settlement Agreement entered between EPA and PADOT on April 20, 2015. Under the Agreement, PADOT and its contractors arranged for the cleaning of the drainage system (combined storm water and sanitary water system) underlying and coursing through the Site and the subsequent installation of a liner system within. The liner system should prevent infiltration into the drainage system of potentially contaminated liquids originating from within the PCBs-contaminated soils at the Site.

PADOT generated and disposed about 17 tons (14 cubic yards estimate) of PCBs-contaminated sediment when the drainage system was cleaned in preparation of the installation of the liner. None of the PCBs-contaminated soil under the asphalt cover was removed.

See prior POLREPs for summary descriptions of these actions.

Additional work was required to complete the scope of the selected Removal Action. The remaining work entailed improvements to the existing asphalt cover to minimize the potential for infiltration of waters through the PCBs-contaminated soil remaining at the Site. The existing asphalt cover is characterized by numerous cracks and openings into and through which rain water is allowed to infiltrate into the underlying PCBs-contaminated soil.

Improvements to the pavement over the area of contamination above 25 mg/kg PCBs was conducted under an Administrative Settlement Agreement and Order on Consent entered 7/20/2016 with a group of Potentially Responsible Parties. After a RAP was submitted and approved by EPA, the paving work was accomplished. The area to be improved was outlined and the weedy materials growing through the gaps and cracks in the asphalt were removed and addressed. A tacking agent was applied over the area to be improved (the area of soil with PCBs greater than 25 mg/kg) and a geotextile was rolled over this area. The geotextile would improve the strength of the asphalt cover. A strip around the perimeter of the area to be addressed was also milled (about 1 inch of asphalt was removed) to allow for better adherence of a new cover.

On Wednesday October 26, 2016 the area was re-paved. Upon conclusion of the paving event, the work requirements of the Settlement Agreement, Response Action Plan, and Action Memorandum were met. Final activities involved removal of the small amount of milling residuals from the Site. All on-Site work was completed October 27, 2016

The scope of the removal response action selected in the Action Memorandum was thus considered to be completed on October 27, 2016.

See Prior POLREPs for summary descriptions of these actions.

The PRP Group submitted a Final Report as required by the Settlement Agreement and Order on Consent. EPA approved the submittal on November 22, 2016 thus determining that the Work required by the Order was fully performed.

Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA and PADOT entered into an Administrative Settlement Agreement on April 20, 2015. Under the Agreement, PADOT installed a liner in the existing combined drainage system. The PADOT work satisfied a large portion of the selected response action.

The remainder of the Removal Action was performed by a group of potentially responsible parties (PRPs) pursuant to an Administrative Settlement Agreement and Order by Consent which was signed on July 20, 2016. These Respondents submitted a Response Action Plan which was approved by EPA on September 15, 2016 and described how the work requirements of the Agreement would be accomplished.

Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
PCBs	Debris	10.34 T	909761		LF
PCBs	Debris	6.94 T	909762		LF

2.2 Planning Section

Anticipated Activities & Issues

No further work or activity is anticipated. Only completion of certain administrative aspects of the Order remains.

The PCB contamination in the soil underlying the Site remains under the asphalt cover. The Site ownership changed after the completion of the field work. The current use relates to parking of vehicles. Should the asphalt cover become compromised, the potential for exposure to underlying PCBs materials exists and the potential for facilitated transport of PCBs increases. However the presence of the liner in the drainage system and the lack of PCBs in the ground water suggests that the potential for off-Site migration of PCBs is minimal.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Narrative

A Special Account was set up for this Site with monies derived from potential responsible parties. Entities conducting response work at the Site were eligible for reimbursement from the account. At this time PADOT was reimbursed for its efforts to line the drainage system. A request for reimbursement for activities relating to the re-paving effort is pending.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Settlement Agreement	\$0.00	\$578,442.00	(\$578,442.00)	0.00%
Intramural Costs				
Total Site Costs	\$0.00	\$578,442.00	(\$578,442.00)	0.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

EPA Region III
Philadelphia Water Department
Pennsylvania Department of Environmental Protection
Pennsylvania Department of Transportation
PRP Utility Group

4. Personnel On Site

OSC - Michael Towle

5. Definition of Terms

No information available at this time.

6. Additional sources of information

All Site files are located in the EPA Regional Office.

7. Situational Reference Materials

No information available at this time.